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August 12, 2019

VIA E-FILING

Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

RE: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms and Conditions Necessary (includes Small Power Producers as Defined in 16 United States Code 796, as Amended) — S.C. Code Ann. Section 58-41-20(A)

SCPSC Docket No. 2019-185-E

Dear Ms. Boyd:

Attached for filing is the Petition to Intervene of Central Electric Power Cooperative, Inc. in the above-captioned matter. By copy of this letter, I am serving all parties of record (including those parties with petitions pending) and requesting that they serve me by electronic mail with all outstanding motions, pleadings or other filings, together with all discovery responses served to date and to be served.

Please do not hesitate to contact me with any questions or concerns.

Sincerely yours,

THE TIENCKEN LAW FIRM, LLC

A handwritten signature in blue ink, appearing to read "Chris McDonald", written over the printed name of Christopher S. McDonald.

Christopher S. McDonald

Attachments

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In Re:)	Docket No. 2019-185-E
)	
South Carolina Energy Freedom Act)	
(H.3659) Proceeding to Establish Duke)	
Energy Carolinas, LLC's Standard Offer,)	
Avoided Cost Methodologies, Form)	
Contract Power Purchase Agreements,)	
Commitment to Sell Forms, and Any)	
Other Terms or Conditions Necessary)	
(Includes Small Power Producers as)	
Defined in 16 United States Code 796, as)	
Amended) - S.C. Code Ann. Section 58-)	
41-20(A))	
)	
)	

**PETITION TO INTERVENE OF
CENTRAL ELECTRIC POWER COOPERATIVE, INC.**

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission's Rules of Practice and Procedure, Central Electric Power Cooperative, Inc. ("Central") hereby files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, Central states as follows:

1. Central is a generation and transmission electric cooperative formed under S.C. Code Ann. § 33-49-10, *et seq.* Central's principal place of business and mailing address is 20 Cooperative Way, Columbia, South Carolina 29210. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the State of South Carolina. Central's distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.

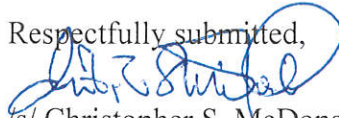
2. Central has a substantial interest in the issues to be considered in this proceeding. Central purchases power from Duke Energy Carolinas, LLC (“Duke”) for five of Central’s member retail distribution electric cooperatives pursuant to that certain *Sixth Amended and Restated Power Purchase Agreement between Duke Energy Carolinas, LLC and Central Electric Power Cooperative, Inc. (FERC Effective Date January 1, 2018)* (the “Central/Duke PSA”). Central’s costs under the Central/Duke PSA are directly affected by Duke’s avoided cost methodology when cooperative members or other parties seek to interconnect distributed generation sources to Central’s transmission system or its member distribution cooperatives’ distribution systems, giving Central a direct and significant interest in this proceeding in which the Commission will consider Duke’s standard offer and avoided cost methodologies. Central’s position is that Duke’s avoided cost methodologies and standard offers should be consistent with the recently enacted South Carolina Energy Freedom Act (H. 3659).

3. Pursuant to Rule R. 103-804(S) of the Commission’s Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

Christopher S. McDonald
The Tiencken Law Firm, LLC
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WHEREFORE, Petitioners request that they be allowed to intervene in this docket, with full rights to participate as a party of record, including, but not limited to, the ability to engage in discovery and participate in all hearings by offering testimony and exhibits and cross-examining witnesses. Petitioner requests the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission’s staff.

Respectfully submitted,



/s/ Christopher S. McDonald

Christopher S. McDonald

THE TIENCKEN LAW FIRM, LLC

234 Seven Farms Drive, Suite 114

Charleston, SC 29492

Charleston, South Carolina
August 12, 2019

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In Re:)	Docket No. 2019-185-E
)	
South Carolina Energy Freedom Act)	
(H.3659) Proceeding to Establish Duke)	CERTIFICATE OF SERVICE
Energy Carolinas, LLC's Standard Offer,)	
Avoided Cost Methodologies, Form)	
Contract Power Purchase Agreements,)	
Commitment to Sell Forms, and Any)	
Other Terms or Conditions Necessary)	
(Includes Small Power Producers as)	
Defined in 16 United States Code 796, as)	
Amended) - S.C. Code Ann. Section 58-)	
41-20(A))	
)	
)	

This is to certify that I, Christopher S. McDonald, have caused to be served this day one (1) copy of the Petition to Intervene of Central Electric Power Cooperative, Inc. in the above-referenced matter to the person(s) named below by electronic mail and depositing same in the United States Postal Service with first class postage affixed thereto and addressed as follows:

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Christopher S. McDonald

Charleston, South Carolina
August 12, 2019